

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION**

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Karen M. Williams,
Magistrate Judge

This Document Relates to All Actions

**JOINT STIPULATION REGARDING DISMISSAL OF WALGREENS BOOTS
ALLIANCE, INC.**

WHEREAS, Plaintiffs have named Walgreens Boots Alliance, Inc. and Walgreen Co. as Defendants in this Action;

WHEREAS, Walgreens Boots Alliance, Inc. is the parent company of Walgreen Co., which is a legally distinct entity; Walgreens Boots Alliance, Inc. does not own or operate any of the Walgreens retail drug stores or pharmacies in the United States and all such stores and pharmacies are owned and operated by Walgreen Co. or a subsidiary of Walgreen Co.; and

WHEREAS Plaintiffs will dismiss Walgreens Boots Alliance, Inc. without prejudice and avoid naming Walgreens Boots Alliance, Inc. in this Action in the future in exchange for (1) Walgreen Co.'s agreement to waive formal service of pleadings in this Action; (2) Walgreen Co.'s agreement not to oppose Plaintiffs' anticipated motion(s) for leave to amend pleadings to substitute Walgreen Co. for Walgreens Boots Alliance, Inc.; and (3) Walgreen Co.'s agreement that Walgreen Co. shall be deemed substituted for Walgreens Boots Alliance, Inc. in any Short Form Complaint identifying Walgreens Boots Alliance, Inc. as a Defendant Pharmacy as of the date of filing of the Short Form Complaint.

It is hereby STIPULATED AND AGREED, by and among the undersigned counsel as follows:

1. Plaintiffs will dismiss Walgreens Boots Alliance, Inc. without prejudice.
2. Undersigned counsel for Walgreen Co. is authorized to accept, and will accept, service of the summonses and complaints in this Action in lieu of formal service, without prejudice and without waiver of any of Walgreen Co.'s defenses or objections to this Action, the Court's jurisdiction, or the venue of this Action, except for those concerning service.
3. Walgreen Co. agrees not to oppose any motion by Plaintiffs for leave to amend a pleading to substitute Walgreen Co. for Walgreens Boots Alliance, Inc., but reserves its right to oppose any such motion on any other basis.
4. Walgreen Co. agrees that Walgreen Co. shall be deemed substituted for Walgreens Boots Alliance, Inc. in any Short Form Complaint identifying Walgreens Boots Alliance, Inc. as a Defendant Pharmacy as of the date of filing of the Short Form Complaint.

IT IS SO STIPULATED.

DATED: March 15, 2021

/s/ Marlene J. Goldenberg
GOLDENBERGLAW, PLLC
Marlene J. Goldenberg
800 LaSalle Avenue, Suite 2150
Minneapolis, MN 55402
Tel.: (612) 436-5028
Fax: (612) 367-8107
mjgoldenberglaw.com

Attorney for Plaintiffs

Respectfully submitted,

/s/ Rebecca E. Bazan
DUANE MORRIS LLP
Rebecca E. Bazan
505 9th Street NW, Suite 1000
Washington, DC 20004
Tel.: (202) 776-5253
Fax: (202) 330-5547
REBazan@duanemorris.com

Attorneys for Walgreen Co. and Walgreens Boots Alliance, Inc.